

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC JOINT APPLICATION OF)
GREEN RIVER VALLEY WATER DISTRICT)
AND EDMONSON COUNTY WATER)
DISTRICT FOR AN ORDER APPROVING)
THE TRANSFER OF OWNERSHIP OF)
EDMONSON COUNTY WATER DISTRICT'S)
HART COUNTY SYSTEM AND THE WAX)
WATER TREATMENT PLANT AND)
APPROVING GREEN RIVER VALLEY)
WATER DISTRICT'S ASSUMPTION OF)
CERTAIN DEBT OBLIGATIONS OF)
EDMONSON COUNTY WATER DISTRICT)
PURSUANT TO THE PROVISIONS OF KRS)
278.020, KRS 278.300, AND 807 KAR 5:001)**

**CASE NO.
2025-00329**

MOTION FOR DEVIATION

By and through the undersigned counsel, and pursuant to 807 KAR 5:001, Section 22, Green River Valley Water District (“Green River District”) seeks the Commission’s approval to deviate from the requirement set forth in 807 KAR 5:001, Section 12(1)(a), which provides that the Financial Exhibit accompanying applications made pursuant to KRS 278.300 by utilities having \$5,000,000 or more in gross annual revenue in the immediate past calendar year, “cover operations for a

twelve (12) month period ending not more than ninety (90) days prior to the date the application is filed.” In support of its Motion, Green River District states:

1. In calendar year 2024, Green River District reported \$7,080,499 in Total Operating Revenues.

2. With the Joint Application filed in this proceeding, Green River District provided an Income Statement and Balance Sheet for Fiscal Year Ending June 30, 2025.¹ This information was prepared in connection with the annual audit recently conducted of the District’s financial transactions for the period July 1, 2024, through June 30, 2025.²

3. Because the Income Statement and Balance Sheet for Fiscal Year Ending June 30, 2025, are for a period which ended approximately 127 days ago, Green River District has also filed monthly Income Statements and Balance Sheets for July, August, and September 2025 with the Joint Application.³

4. The financial information provided by Green River District covers 15 months, rather than only 12, and includes an audited financial statement for Green River District’s fiscal year, which ended on June 30, 2025, as well as Green River District’s most recent Income Statement and Balance Sheet.

¹ Joint Application, Exhibit 12.

² Joint Application, Exhibit 14.

³ Joint Application, Exhibit 13.

5. The audited financial statements and monthly updates provided by Green River District provide the Commission with accurate, timely information regarding Green River District's financial condition.

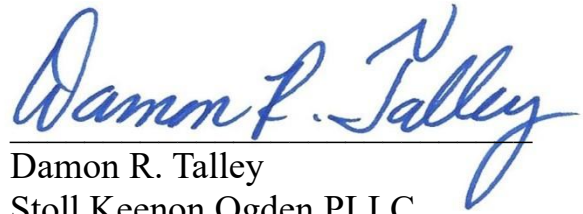
6. Requiring Green River District's bookkeeper and auditor to prepare a separate set of financial documents specifically for this proceeding would have delayed the filing of the Joint Application and added to the expense of the transaction that is the subject of this proceeding.

7. Most importantly, a separately prepared set of financial documents would **not** have provided the Commission with greater insight into Green River District's financial condition than the documents provided by Green River District with the Joint Application.

WHEREFORE, on the basis of the foregoing, Green River District respectfully moves the Commission to grant its Motion for Deviation and find the financial documents provided as Exhibits 12, 13, and 14 to the Joint Application filed contemporaneously with this Motion sufficient for the purposes intended by the regulation.

Dated: November 3, 2025

Respectfully submitted,



Damon R. Talley
Stoll Keenon Ogden PLLC
P.O. Box 150
Hodgenville, KY 42748-0150
Telephone: (270) 358-3187
Fax: (270) 358-9560
damon.talley@skofirm.com

Tina C. Frederick
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3951
Fax: (859) 259-3597
tina.frederick@skofirm.com

*Counsel for Green River Valley
Water District*